



**MCI Telecommunications
Corporation**

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EX PARTE OR LATE FILED

ORIGINAL

Mary L. Brown
Senior Policy Counsel
Federal Law and Public Policy

RECEIVED

January 26, 1999

JAN 26 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

Re: EX PARTE in Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, CC Docket No. 96-115, Implementation of the Non-Accounting Safeguards of Sections 271 and 272, CC Docket No. 96-149

Dear Ms. Salas:

On January 22, 1999, MCI WorldCom, Inc. met with staff members of the Common Carrier Bureau to discuss the above-captioned proceedings. Present at the meeting were Margaret Egler, Bill Agee, Peter Wolfe, Anthony Mastano, and Eric Einhorn. Representing MCI WorldCom, Inc. were Lanese Jorgenson, Sherry Lichtenberg, and myself. Attached are the presentation materials that were provided to staff at the meeting.

Sincerely,

Mary L. Brown

CC: Margaret Egler
Bill Agee
Peter Wolfe
Anthony Mastano
Eric Einhorn

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List ABCDE

CPNI Rules:
New York local marketing
experience

CC Docket Nos. 96-115, 96-149

Presentation by MCI WorldCom

January 22, 1999

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COMMUNICATIONS
DIVISION

Sales process

- Outbound telemarketing representative calls a prospect
- If the prospect responds positively to the sales proposition:
 - rep must ask permission to query Bell Atlantic Customer Service Record (CSR)
 - the representative queries the CSR through the GUI interface

Bell Atlantic CSR

- MCI WorldCom has “stripped” the CSR of its CPNI content. Our reps see only:
 - Customer name
 - Billing telephone number
 - Address
 - Directory listing information
- Reps do not see:
 - Features, spending levels, any other CPNI

Order processing

- To install customer, MCI WorldCom must “recreate” local service data from scratch
 - Match customer names (our data vs. BA’s)
 - Match customer address (our data vs. BA’s)
 - Billed phone number v. working phone number
 - Features
 - Inside wire contract

Impact on MCI WorldCom

- Can't sell features or inside wire maintenance plan as well as the incumbent can
- Can't sell other services within the local "total service offering" as well as incumbent can
- Can't notify the customer of features that the customer has forgotten or doesn't know that they have -- e.g., ISW contracts (55% take rate in NY)
- Can't "match" the services that the customer has with incumbent

Submission of local order to BA

- MCI verifies information and transmits to BA for installation
- If the local order is not correct, the order is rejected
- BA creates new CSR, takes old CSR out of its system, and passes new record to MCI WorldCom

NY: “Best price” rule

- In NY, the PSC says the local customer is entitled to make an informed choice in local providers, including rate information
- Without access identical to what incumbent has (name, address, directory listing, features, other services), accurate comparison information cannot be provided

BA 272 affiliate has lots of CPNI advantages

- 272 affiliate can engage in local and long distance
- No consent required
 - Immediate access to: name, address, billing phone, working phone, directory listing information, features, inside wire agreement, usage information

Lessons

- Allow new entrants to use CPNI to initiate service
 - Customers deserve price comparisons and detailed product disclosure
 - For purposes of initiating service, we do not need usage CPNI
- For all other purposes, require both Bell 272 affiliates, and new entrants, to obtain most CPNI upon oral consent

Go to [Service Request Page](#)

Customer Service Record

[View the RAW EIF File](#)

Administrative Data Table				
Billing Telephone Number			2128316684	
Customer Indicator			R	
Version			AA	
Customer Negotiator Name			Sherry Lichtenberg	
Purchase Order Number			19990115152943	
Customer ID			MCIL	
Customer Negotiator Telephone Number			3013603412	
Business Segment			R	
Customer Service Record				
Billing Telephone Number			2128316684	
Multi-Line Text				
212 831-6684 732 M 2 1-				
		1MR	ACCOUNT	
		ACCOUNT	Q11	2
LN		SCARDINO, K	I 8-6-98	
LA		(OAD) 1755 YORK AV,		
		MANHATTAN, NY+ 10128	I 8-6-98	
LOC		FLR 18/APT 18F	I 8-6-98	
		---DIR		
DEL		1,1	I 8-6-98	
		---BILL		
BN1		KIMBERLY SCARDINO	8-10-98	
BA1		APT 18F	8-10-98	
BA2		1755 YORK AV	8-10-98	
PO		NEW YORK NY		
		10128	8-10-98	
LB		01000		
STI		LSSA 07-06-98		
SS		186-60-3649KS, Y	8-6-98	
TAR		002		
		---S&E		
1	1MR	/TBE A/PIC NONE/PCA FN,		
		07-06-98/LPIC NONE		
		/LPCA FN, 07-06-98 ++FCC		

LINE CHARGE++

		(Monthly Charge for Dial	
		Tone)	T 12-28-98
1	ESX	(Call Waiting)	T 8-6-98
1	PSEBO	/PROX Y (Access Code Restriction)	I 12-28-98
1	RBZXL	/LCC JTB (Blocking Service Charge)	I 12-28-98
1	VMH3A	/RCYC 3/MWI /CFNB 212	
		369-6608/CFND 212	
		369-6608 (Home Voice Mail Advantage)	T 8-6-98
		---IN SERVICE	
1	9ZR	FCC LINE CHARGE	
		---LOCAL SERVICE	
		AMOUNT SUBJECT TO FED &	
		LOC TAX	
		AMOUNT NOT SUBJECT TO	
		FED & LOC TAX	
		AMOUNT SUBJECT TO FED	
		NOT LOC TAX	
		AMOUNT SUBJECT TO LOC	
		NOT FED TAX	
		---PURCHASE ORDER NUMBERS	
		C1XA5998Q 12-28-98	
		C2JD3790Z 12-29-98	

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